

Exhibit P

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 SOUTHERN DIVISION

4 GARY BRICE McBAY,
5 Plaintiff,

6 VERSUS CIVIL ACTION NO: 1:07cv1205LG-RHW
7

8 HARRISON COUNTY, MISSISSIPPI,
9 by and through its Board of
10 Supervisors; HARRISON COUNTY
11 SHERIFF, George Payne, in his
12 official capacity; CORRECTIONS
13 OFFICER MORGAN THOMPSON,
14 acting under color of state law,
15 Defendants.

16 30 (b) (6) DEPOSITION OF HARRISON
17 COUNTY SHERIFF'S DEPARTMENT,
18 STEPHEN E. CAMPBELL, DESIGNEE

19 Taken at the offices of Dukes, Dukes,
20 Keating & Faneca, P.A., 2909 13th
21 Street, Sixth Floor, Gulfport,
22 Mississippi, on Thursday, October 1,
23 2009, beginning at 1:23 p.m.

24 APPEARANCES:

25 PATRICK R. BUCHANAN, ESQUIRE
 MARK V. WATTS, ESQUIRE
 Brown Buchanan, P.A.
 796 Vieux Marche' Mall, Suite 1
 Biloxi, Mississippi 39530
 ATTORNEYS FOR PLAINTIFF

1 Q. And what did Mr. Martin ask you about
2 the Towner incident?

3 A. Well, he just -- he just didn't like it.

4 Q. What did he not like about it?

5 A. Well, what I got from him was inmates
6 never do anything wrong, correction officers
7 always screw up.

8 Q. So he felt that in the Towner incident
9 that it was the correctional officers that did
10 wrong to the inmate?

11 A. Well, they did; but the way he was
12 portraying it, it was -- it was a lot more severe
13 than what happened.

14 Q. Did he feel that -- did you do an
15 investigative report on James Towner?

16 A. I did.

17 Q. Did he feel that your report did not
18 capture exactly what happened? Is that what he
19 tried to convey to you?

20 A. No. I don't know if he read the report
21 or not, but -- I tell you what -- no, he just --
22 he kind of just didn't believe it.

23 Q. Didn't believe the report?

24 A. I don't know if he didn't believe the
25 report. He just didn't believe that -- yeah, he

1 THE WITNESS:

2 I'm sorry?

3 MR. WATTS:

4 Q. You can answer.

5 MR. GEWIN:

6 I'll object to the form of the question.
7 He's asking for your thoughts, but if you can
8 answer it, you can give it a shot.

9 A. Well, Steve Martin is a well respected
10 guy in his field, but the report -- I read the
11 report, but the sheriff didn't tell me to do
12 anything, okay, pursuant to that report. And I
13 read it just to read it. I mean, he gave it to me
14 to read, just to read it. He didn't say -- he
15 didn't tell me to do anything. And so I read it.

16 And, you know, he met -- Martin met, I
17 think, with Riley and maybe the sheriff after he
18 completed what he did and so -- you know, I'm not
19 putting anything off on them, but they -- you
20 know, that was their deal. And, you know, if he
21 told me to do it, do something, you know, if he
22 said go do this, I would have done it.

23 MR. WATTS:

24 Q. But what were your thoughts when you
25 read that there's -- a very disturbing pattern of